CWA 106 Grant Proposal
FOR
KEWEENAW BAY INDIAN COMMUNITY
FINAL

Data Quality Objectives
Work Plan
October 1st, 2010 – March 31st, 2013

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KEWEENAW BAY INDIAN COMMUNITY
CWA SECTION 106 PROGRAM

DATA QUALITY OBJECTIVES
AND
WORK PLAN FY2011-FY2012

I. Background

The Keweenaw Bay Indian Community (KBIC) is located in Baraga County in the northwestern part of Michigan's Upper Peninsula, near the southern terminus of Keweenaw Bay. The Reservation consists of 70,327 contiguous acres which includes approximately 17 miles of Lake Superior shoreline, 80 miles of streams and rivers, 15,000 acres of lakes and 3000 acres of wetlands. The Reservation borders the nearby village of L'Anse and encompasses the village of Baraga, Michigan. KBIC has concentrated housing units in Baraga, Zeba (a community 3 miles northeast of L'Anse), and the Township of Chocolay in Marquette County. Keweenaw Bay Indian Community was established by the Treaty of September 30, 1854. A map of the exterior boundaries of the L'Anse Reservation and other KBIC lands are provided as Attachment I.

Keweenaw Bay Indian Community currently has 3,076 enrolled members with a large number living within the L'Anse Reservation boundaries. The Tribe employs approximately 1000 people within tribal government and other tribally owned enterprises. The terrain within the boundaries of the Reservation is generally hilly with steep slopes rising near the Keweenaw Bay shore. Elevation ranges from 183 m at Keweenaw Bay to about 550 m in the most southeastern section of the Reservation. Habitats within the Reservation include rare interdunal wetlands, shoreline wetlands, critical fishery nursery habitats and forested uplands. The Reservation experiences a typical, four-season climate with the exception of effects from Lake Superior. These effects are in the form of moderated winter temperatures and extreme winter snowfall, up to a recorded maximum of 32 feet in the winter of 96-97.

II. Narrative

A. Needs

The Keweenaw Bay Indian Community is highly concerned about the quality and protection of its environment. In a calendar year 2000 survey conducted for the KBIC Integrated Resources Management Plan which was adopted by the council in 2003, water quality was the number one concern among tribal members. A strong cultural relationship between the Ojibwa people and their land has resulted in spiritual, medicinal, hunting, gathering and fishing practices that are especially susceptible to activities that adversely impact the environment. The Tribe wishes to ensure a high quality environment for its people by avoiding or mitigating any activities that are potentially detrimental to our land and water resources, our tribal members, and our culture. As a result of this commitment to the protection of our natural resources, the Keweenaw Bay Indian Community established the Keweenaw Bay Natural Resources Department. More recently, the KBIC Tribal

Council established a Natural Resources Committee as part of the Keweenaw Bay Indian Conservation District. The mission of this Committee, and of the Tribal Council, is to assist in the development and implementation of the resource management plans of the Natural Resources Department. Both actions of the KBIC Tribal government demonstrate its recognition of the need for the Community to manage its resources as well as a strong commitment of the KBIC Tribal government to address this need. To this end, KBIC has adopted a 10 year Integrated Resource Management Plan (IRMP) with established objectives and benchmarks, including water quality, to improve the long term management of natural resources for the entire community. The plan is to be revisited on an annual basis by all contributors in the plan. The plan was updated at the end of calendar year 2003.

Several mining corporations have begun actively exploring for metallic sulfide ore bodies within and nearby the L'Anse Indian Reservation. One firm has publicly stated their intent to pursue permitting of a nickel-sulfide mine in the Upper Peninsula to the East of the L'Anse Reservation. This company has also identified a copper sulfide ore body within the Reservation boundaries and is actively exploring this prospect using drilling and geophysical data collection methods. This potential mine site represents the most serious threat to the health and safety of Reservation water resources, located in the headwaters area of the Silver River Watershed, arguably the largest and most pristine watershed.

Continuing trends have the potential or have been observed to adversely impact the waters of the Reservation. These KBIC trends include a reactivated power plant that uses tires and chipped railroad ties, exploratory drilling for a potential sulfide mine and a new hospital being built on the reservation. KBIC continues to allow the harvest of logs on their land at a rate of ~ 200 acres/ year, and private logging interests vary from ~ 1,000 acres/ year. At present, there has been a noticeable increase in the number of new home starts on the Reservation. The lack of environmental health ordinances which require such things as: a specific setback from the water's edge, correction of failing septic systems, isolation distances for wells and septic systems, combined with an overall increase in the number of homes along water resources have the potential to increase runoff, erosion and the input of nutrients to our waters. While this type of ordinance hasn't been approved, a Utility Ordinance adopted in January of 2002 is a first step in reducing the human impacts to Reservation waters.

In addition, current and previous logging practices have adversely impacted areas within many watersheds on the Reservation. The sedimentation load for many streams has increased due to poorly constructed stream crossings and logging roads. Sedimentation adversely impacts critical habitat of macro invertebrate species and spawning areas for native fish. All aquatic species are important for a sustainable ecological community and for recreational and cultural uses among Tribal members on the Reservation.

During FY 2011, the primary objective of the Natural Resources Department will be to continue with the development of the various components which make up a comprehensive program to address water quality issues on the Reservation. This program will characterize and address the current problems related to water quality by 1) developing tailored water quality standards, 2) continuing with our pursuit of 303 program authorization, 3) continuing a water quality monitoring program, including a project focused on the Silver River Watershed and the potential metallic sulfide mining 4) continuing a watershed inventory, and working to continue funding for aquifer studies. 5) conducting public education and outreach. Pursuing these objectives will be the responsibility of

tribal environmental staff consisting of one FTE Water Resources Specialist and one FTE Water Resources Technician. Due to the large size of the Reservation and the large scope of the work that is required to address the water issues on the Reservation, funding will be required to achieve these objectives and to maintain a sufficient water staff. We will also work with the community and related agencies to represent our tribal perspective and educational approach on water issues.

B. Priorities

The primary objective of the Keweenaw Bay Indian Community is to develop a comprehensive water quality protection and management program. This program will consist of a number of different aspects:

To provide a foundation for this program, the first aspect will be to continue with our pursuit of CWA 303 program authorization and the adoption of Tribal Water Quality Standards. The establishment of tribal water quality standards will meet the unique needs of the Community by instituting a heightened protection of Reservation waters that is mandated by the nature of the traditional and spiritual uses of surface water by our culture. Also, these standards will serve as the foundation upon which the Tribe's water program will be built by establishing the water quality goals for the Reservation's waters.

The second aspect of the Water Quality Protection and Management Program will be the continued implementation of a surface water quality monitoring program. This program will serve to provide a basic screening of the quality of surface water resources on the Reservation. This study is designed to provide continued monitoring of all Reservation waters to be compared to the reference baseline data to track trends in water quality over time and to highlight potential, or emerging water quality impacts. A portion of this study will be a special project, focused on the Silver River Watershed:

It was anticipated that sufficient EPA funding would be available to continue the focused, surface water monitoring study in the Silver River Watershed began in FY2005 by the U.S. Geological Survey. However, current EPA funding will not meet this goal. The additional funds made available to KBIC specifically to address the sulfide mining issue in this fiscal year will be used to carry out as much of the original study as possible. KBIC will pursue additional, outside funding in order to complete the study. This study will attempt to address concerns of the community over the potential impact of proposed, metallic sulfide mining to the watershed by establishing a detailed, baseline study of some of the parameters necessary to characterize the impact of sulfide mining. Additional assessment of biologic parameters, such as macro invertebrate and fish assessments will be undertaken to further establish baseline conditions in the watershed.

The third aspect of the Water Quality Protection and Management Program will involve the continued involvement and participation of Natural Resources Departmental staff on local and regional committees with water protection goals. Local involvement will include participation in the KBIC Natural Resource Committee functions and as members of local "Area of Concern" public advisory council groups. Regional committees will include the Lake Superior Work Group's Habitat and Aquatic Committees. Continued KBIC involvement with the Lake Superior Task Force is also planned for this grant period. Participation in additional committees will occur as available staff hours and need arises. Recent developments concerning an increasing interest in sulfide mining within reservation boundaries are expected to dramatically increase the amount of time and resources spent on this aspect of the program, outside of current committee participation. The

primary goal of our participation is to assure that the concerns of these committees and others reflect the best interests of the Community and that the programs established on the Reservation are consistent with the goals of these committees, as well.

The fourth aspect of the Water Quality Protection and Management Program will involve activities related to public outreach and education, such as working with local schools and groups. The long term goals of these activities are to 1) educate the public about the importance of various aspects of water quality; 2) increase awareness of the ongoing projects within the department that function to protect water quality on the Reservation; 3) raise public awareness of how they can contribute in the effort to protect our waters. 4) Raise public awareness of projects and developments within and near the Reservation which may affect water quality on the Reservation.

The fifth aspect of the program is to address groundwater protection and safe drinking water issues on the Reservation with a watershed inventory. Many tribal members are dependent on wells and onsite waste treatment. A problem with poor quality/ unsafe drinking water has been documented throughout the reservation. A number of wells have been reported to be contaminated on the Reservation by nitrate, hydrogen sulfide, iron, manganese, and/or total Coliform. The source and the extent of this contamination are at present undefined. This contamination could be due to problems with well construction or may indicate groundwater contamination associated with a number of unabandoned wells, industrial, and household areas that are known to exist within the study area. In part, some of the contamination could also be generated from the aquifer rock bodies.

In order to fully protect and properly manage our groundwater resources, the Natural Resources Department will continue a watershed inventory project:

This project is designed to assess and protect groundwater resources on the reservation and will be the initiation of further study of the Silver Watershed Inventory, which was initiated in 1999 using BIA funding. This area represents a largely unpopulated and undeveloped region that is currently experiencing a rise in mining activities and development, particularly in the amount of exploratory drilling occurring in the upper reaches as well as new development downstream. The inventory will involve assessing groundwater and surface water quality. Surface water will be assessed for potential sources of pollution such as sedimentation and excess nutrient input. Also, water quality will be assessed through the chemical analysis of samples for various parameters. Groundwater quality will be assessed by sampling individual wells for nitrates, Coliform and other parameters. To assess possible sources of groundwater pollution, sanitary surveys of wells/onsite waste treatment systems and interviews of homeowners will be performed as well as tours of the major, industrial and municipal facilities within the watershed. The long term goals of this project are: 1) to compile a GIS database that will be used to assess if the individual problems discovered are indicative of problems that are related by spatial factors; 2) the protection and improvement of the water resources of the Reservation by identifying and correcting problems such as failed onsite waste treatment systems, unabandoned wells, sources of sedimentation or sources of excess nutrient input. To date assessments for all reservation watersheds have been completed.

A complimentary GIS/DRASTIC Aquifer Vulnerability Analysis performed by the Inter-Tribal Council of Michigan was completed and reviewed in the fall of 2003. The scope of the analysis covered the L'Anse Reservation and the surrounding watersheds and consisted of multiple GIS spatial analysis of parameters such as Depth to Bedrock, Soils, Depth to Water, Net Recharge,

Aquifer Media, etc. This project utilized DRASTIC methodology, which applies a ranking to each parameter, based on its weighted affect on aquifer vulnerability, arriving at a spatial layer showing varying aquifer vulnerability conditions within the reservation and its contributing watersheds.

We will continue support of this workplan with BIA Water Resources and Environmental Management funding for such projects as a well abandonment program, Stormwater Inspector Certification and possibly a third, USGS continuous stream gauging station. Other grant possibilities will be assessed for potential use in KBIC water program and project planning and implementation, such as a USFWS grant for wetlands delineation and plant inventories.

III. Base Program

A. Staff

Keweenaw Bay Indian Community is governed by The Keweenaw Bay Tribal Council. The Council consists of a President, Vice-President, Secretary, Assistant Secretary, Treasurer and seven additional council members. All Tribal Council seats are elected from two voting districts (Zeba and Baraga) for three-year terms. Tribal Council meetings are held regularly on a weekly basis.

In 1999, the Natural Resources Department was established by the Tribal Council to address environmental and natural resources management issues. The staff of the department consists of a Natural Resources Director, Fish and Wildlife Biologist, an Environmental Specialist, a Water Resources Specialist, a Natural Resources Specialist, an Environmental Response Program Specialist, two Natural Resources Technicians, one Water Resource Technician, and one secretary. The Natural Resources Department is managed by the Natural Resources Director who is supervised by the Tribal CEO. The Tribal CEO is supervised by the Tribal Council.

This proposal will fund a full time Water Resources Specialist and full time Water Resources Technician. Their respective duties include 1) Specialist: lead in the implementation of various surface water, ground water, wetlands, drinking water and wastewater programs for the Community; serve as a liaison with Indian Health Service; administer water quality grants and 2) Technician: assist Specialist with field work; maintain water laboratory; enter and compile relevant water quality data; assist with grant administration. These two staff members will implement the workplan described herein.

B. Funding Sources

The KBIC Natural Resource Department currently administers EPA General Assistance Program, EPA Brownfield and EPA Water Pollution Control grants. The Natural Resources Department also currently has BIA Water Resources and Environmental Management grants for use in the biological, physical, and chemical assessment of Reservation waters, as well as a well abandonment program. The Department also utilizes grant funding from the North American Wetlands Conservation Act for the acquisition of wetlands for preservation. An Administration for Native Americans (ANA) grant was used to develop a Tribal Conservation District and a consequent Natural Resources Committee. The department also administers various implementation grants from the U.S. Fish and Wildlife Service, USDA Rural Development, and the Natural Resources Conservation Service for

activities such as stream habitat improvement, erosion control, public utility improvement, cultural research, land acquisition, wetlands and wildlife inventories.

IV. Work Plan October 1, 2010 – March 31, 2013

The Keweenaw Bay Indian Community shall perform their water quality program and data collection activities as planned in this document. The Keweenaw Bay Indian Community's water quality protection and management program shall continue to build upon the program components developed during the past, five fiscal years. KBIC will undertake a self-evaluation of these components at the end of each fiscal year, in addition to the required reporting and deliverable schedule. This evaluation plan is a requirement of 40CFR, part 35.515. This self evaluation is part of the Water Program Grant Evaluation process and will include discussions on accomplishments, effectiveness, problem areas and suggestions concerning the workplan components. This will help facilitate the integration of the workplan components, insuring continuous progress toward and focus on the primary goal of the water program. The primary goal of this program is to maintain and protect the high quality of the water resources of the Community. Five components makeup this program and will be implemented during FY 2011- FY 2012.

These components are: 1) continuation of tribal water quality standards adoption and the CWA 303 program authorization process, 2) continuation of a surface water quality monitoring program, including monitoring focused on the Silver River Watershed, 3) participation in organizations with interests in water quality protection and management, 4) public education and outreach, 5)NPDES Compliance Duties.

V. Tribal Assessment Report (TAR)

As part of the CWA Section 106 grant requirements, KBIC will submit a Tribal Assessment Report (TAR) to EPA Region 5 that will consist of three components including a Monitoring Strategy, Water Quality Assessment Report and electronic copies of water quality data.

A. Monitoring Strategy

The Monitoring Strategy was a deliverable for the FY08 funding period. The monitoring strategy includes the components listed in Appendix A: Assessment Reports I. Monitoring Strategies from the Final Guidance on Awards of Grants to Indian Tribes under Section 106 of the Clean Water Act document published October 2006. In summary, the strategy includes monitoring objectives describing the major goals and measurable objectives of the program along with a strategy or design for collecting data and information. The monitoring strategy also defines the core water quality indicators for the program, QA requirements and data management, analysis and assessment methodology. Lastly, the strategy outlines the reporting requirements and programmatic evaluation and needs planning that will be implemented to assure the program is serving the water quality needs of the Tribe. The monitoring strategy will be updated at the end of each grant cycle.

B. Water Quality Assessment Report

This report will include the components listed in Appendix A: Assessment Reports II. Water Quality Assessment Report from the Final Guidance on Awards of Grants to Indian Tribes under Section 106 of the Clean Water Act document published October 2006. In summary, the report will

include an atlas table of KBIC tribal water resources and a narrative description of tribal water quality monitoring programs and assessment methods used. The report will also discuss the results and findings from water quality monitoring and any issues of concern to the tribe or water quality stakeholders.

The Water Quality Assessment Report will be submitted within 90 days of the contract period end date for this new 2 ½ -year grant period as specified in the Programmatic Conditions section of the EPA Grant Agreement document.

C. Electronic Copies of Water Quality Data

The Tribe will download water quality data into the EPA Region 5 WQX system annually at a minimum after completion of the data review and validation process.

1. Water Quality Standards/303,401 Program Authorization:

We will continue with the process of adopting tribal water quality standards. These standards will meet the specific needs of the Community by identifying and defining the uses unique to our culture and establish associated numeric and narrative criteria to protect these uses. As part of this objective, the tribe has continued with its pursuit of program authorization for CWA 303,401 by working closely with US EPA and the Region Council toward completion of the application. We are aware this process will take time we will continue the process until completed.

a. Output:

How do we ensure that the cultural, spiritual and medicinal uses of the water resources on the Reservation are protected?

The establishment of tribal water quality standards will meet the unique needs of the Community by instituting a heightened protection of Reservation waters mandated by the Community's cultural, medicinal, and spiritual uses of surface water. These standards will serve as the foundation upon which the Tribe's water program will be built by establishing the water quality goals for the Reservation's waters.

b. Outcome:

1). CWA 303,401 Program Authorization: We will assemble and transmit any information and/or documentation requested by the EPA during the processing and approval of our 303,401 program authorization application.

2). Water Quality Standards: We will adopt tribal water quality standards that identify and define uses unique to our community and establish numeric and narrative criteria to protect these uses.

c. Design:

1). CWA 303 Program Authorization: The EPA will review all documentation and information submitted as part of our completed application. We will submit any additional documentation and information as requested by the EPA.

2). Water Quality Standards: The Tribal Council, EPA and the public at large shall participate in the review and revision process of developing water quality standards. After two public meetings and a 60 day period of public review, we will make any necessary revisions to the draft standards. Upon the completion of these revisions, the draft will be submitted to the Keweenaw Bay Tribal Council for final approval. After the Tribal Council has approved the standards, the standards will be officially submitted to the EPA along with a completed 303,401 TAS application for final review and approval.

d. Core and Supplemental Indicators:

1). CWA 303,401 Program Authorization: The EPA will review our application for CWA 303,401 Program Authorization. If any additional information is required during the final review of our application, then we will provide this information in a timely manner. This is an ongoing process that could extend into FY2011 and even FY2012.

2). Water Quality Standards: The WQS are not going to be approved in time for the TAS application process, but will be done soon after. If no revisions are required after the end of the public comment period, the draft water quality standards will be submitted to the Tribal Council for final review and adoption by. If revisions are necessary after the public comment period, then standards will be revised. Further revisions may be required as part of the review by the Tribal Council and a second, technical review by the EPA technical contacts. If the EPA technical contacts and the Tribal Council are satisfied with the final draft of the standards, the water quality standards shall be officially submitted to the Council for adoption, and subsequently submitted to the US EPA for final review and approval.

e. Quality Assurance:

The decision errors are not applicable to this objective as EPA's oversight will ensure no errors and thus determine false positives and false negatives.

f. Milestones:

Submittal of our TAS 404, 303 application to the EPA for initial review.

g. Timelines:

This portion of the workplan will be worked on during down times from field work throughout the fiscal year.

h. Data Management:

We will utilize available data for development of our standards and 303,401 status, as well as data accumulated under this workplan and associated QAPP's.

We will also utilize data from State and Federal agencies to strengthen our application where it is deemed necessary.

i. Data Analysis/Assessment:

We will be working with the EPA and other various (USGS, GLFWC, ITC, MTU etc.) agencies to analyze and reassess all phases of our application before final submission.

j. Deliverables:

Progress reports will be submitted according to the grants requirements and guidelines. The reporting requirement at present is written quarterly reports submitted to the EPA project coordinator and upon closure of grant. Copies of all public outreach material generated as part of the public review and education aspects of this project will be submitted to the EPA.

k. Programmatic Evaluation:

It is expected that KBIC will obtain programmatic approval under section 303,401 of the CWA and subsequently obtain US EPA approved Tribal Water Quality Standards and eventually authority to administer permitting under section 404 of the CWA.

j. General Support and Infrastructure Planning:

The estimated cost of this project for FY2011-FY2012 is: $65,199.45. The specific costs of this project are: Personnel Salary and Fringe: $43,244.72 (FTE 0.30 at $**15.76**/hr; Fringe: $16,799.72) Other Supplies: $3000.00 Other Fees (Phone/Internet): $1250.00 Vehicle Lease/Training/Travel: $3,951.84 Office Space: $4,275.00 Indirect Cost (Salary * 35.84%) = $9,477.89

2a. Surface Water Quality Monitoring:

We will continue with our surface water quality monitoring program, by implementing a core monitoring program of reservation waters, utilizing the same sampling procedures, parameters and strategies of the baseline program, but changing the sampling sites to obtain a broader picture of the Reservation waters, to compare to the baseline data set (**See Attachments IV, V and VI**). A continued, core monitoring program is necessary to insure that current water quality of the surface waters on the Reservation is not impaired. It will also enhance the multi-year, baseline project database and will include all watersheds which encompass the Reservation.

a. Output.

During the grant cycle we will monitor a number of sites predetermined during the development of our QAPP for this project. The parameters we will monitor, and the sites which we monitor, have been determined by the QAPP (**See Attachments IV and V**) for this project. If water quality is found to be degraded, we will develop a corrective action plan and seek additional funding to implement the plan. The sites monitored in these fiscal years will be monitored as part of an ongoing effort to build a baseline water quality database for the Reservation's waters.

All of the sites existing within the Silver Watershed will be used to help establish and monitor water quality potentially affected by the mining exploration ongoing within the watershed.

b. Outcome:

What is the current quality of Reservation waters?

The surface waters of Keweenaw Bay Indian Community are critical resources for both human and environmental health. While these resources are believed to be relatively pristine, monitoring efforts are needed to assure their future quality. Monitoring has established a baseline for the current state of surface water quality for Reservation waters, a necessary first step in obtaining tailored, Water Quality Standards for Keweenaw Bay Indian Community waters. Annual monitoring now serves to track any trends or changes in water quality, in addition to enhancement of the baseline dataset.

The expected results are that the knowledge base of Reservation watersheds will increase. The water resources will be protected, water quality standards will be met and any emerging impacts will be detected.

c. Monitoring Design:
This scope of the monitoring program will include the entire Reservation as defined by its exterior boundaries and the watersheds that encompass the reservation. The number and location of the sites sampled will follow the guidelines established in the QAPP for this project.

The quality of surface water shall be evaluated by comparing results with existing data sets for similar waters on the Reservation, previous studies of regional waters, state/federal water quality standards, and Great Lakes Water Quality Initiative. Sources of these data sets include but are not limited to: Michigan Department of Environmental Quality, the Michigan Department of Natural Resources, USGS, Bureau of Indian Affairs, and the Lake Superior Binational Program.

The parameters used to determine the level of water quality within the sampling locations are listed in **Attachment V**. These include the 9 mandatory parameters required by the region V guidance.

d. Core and Supplemental Water Quality Indicators:

We will monitor the sites selected during the development of the QAPP for the parameters chosen within that document. If water quality is degraded, we will then develop a corrective action plan and seek funding sources to implement this plan. If the water quality is identified as not degraded, we will take no further action. Sites will continue to be monitored annually through the grant period for the development of a database on Reservation water quality. The length of this monitoring will be determined by the QAPP for this project.

e. Quality Assurance:

Decision errors are described in the EPA approved QAPP for the Surface Water Monitoring Program. The QAPP for this project will be submitted to the US EPA for approval before sampling commences.

f. Milestones:

Completion of all sampling sites for each of the four quarters this grant period. This will also include data entry.

g. Timeline:

Sampling will be completed quarterly throughout the grant period. This is done in or near the middle of each quarter to provide time for reporting requirements and data entry at the beginning and end of each quarter.

h. Data Management:

Data acquired through sampling will be put into a few different databases and reports as follows.

1) STORET – All analytical and sampling data will be input into the STORET database.
2) GIS – A comprehensive GIS database will be created and maintained from data acquired through sampling.

i. Data Analysis/Assessment:

Data analysis for this project will be conducted by the Natural Resources staff for the Keweenaw Bay Indian Community. All data will be reviewed as it is received before entry into our databases.

j. Deliverables:

Progress reports will be submitted according to the grant's requirement and guidelines. The reporting requirement at present is written quarterly reports submitted to the EPA project coordinator and upon closure of grant. This includes the water quality assessment report as per the TAR required by the EPA. +These reports shall include a summary of the tasks completed as they relate to this project and a summary of all the data collected to date.

k. Programmatic Evaluation:

The environmental problems requiring solutions are that development, industry and human activities are impacting Reservation water resources. No other agency is currently monitoring the streams, inland lakes and Keweenaw Bay to determine the effects of such activities and whether or not the currently applied water quality standards are being met. Continuous monitoring serves to insure that Reservation water resources are protected and that the currently applied water quality standards are being met. Monitoring also serves to enhance our knowledge of the current state of Reservation water resources, adding to the baseline, water quality dataset.

j. General Support and Infrastructure Planning:

The total cost for this project in FY2011-FY2012 will be: $245,278.05 The specific costs associated with this project are: Personnel Salary/Fringe: $103,869.76 (Water Resources Specialist: $15.76/hr FTE 0.30; Water Resource Technician: $11.89/hr FTE 0.50; Fringe:$41,662.26) Other Supplies: $6,120.00 Outside Laboratory Costs: $98,743.12 Vehicle Lease/Travel/Training: $7,300.00 Office Space: $5,700.00 Telephone/Internet: $1250.00 Indirect Cost (Salary * 35.84%)= $22,295.17

2b. Silver River Watershed Monitoring (Mining):

In response to recent metallic sulfide mining exploratory activity, KBIC will perform a water quality study of the Silver River Watershed. This study will address concerns of the community over the potential impact of proposed, metallic sulfide mining to the watershed by establishing a comprehensive baseline data set that includes parameters necessary to determine sulfide mining related impacts and measure resource injury. Actual sampling will depend on funding as well as quality and results of FY2011 sampling, per the EPA approved QAPP for this project.

a. Output.

The environmental problems requiring solutions are that several mining firms are actively exploring within the L'Anse Indian Reservation, in hopes of extracting metallic sulfide minerals. At least one form has identified a site for a potential nickel-sulfide mine. Such mining activities have been shown to create a significant, negative impact on the surrounding ground and surface water resources and wildlife. There is a need to collect baseline water quality and biologic data to characterize the "pre-development" conditions that exist in the watershed targeted for sulfide mining operations, in order to insure that no undocumented, significant impacts occur in the watershed.

b. Outcome:

What is the current quality of Silver River Watershed and how can KBIC detect and quantify any impact from proposed, metallic sulfide mining within the watershed?

The surface waters of the Silver River Watershed are critical resources for both human and environmental health. While these resources are believed to be relatively pristine, additional monitoring efforts are needed to ensure their future quality and protect these waters from potential impacts caused by metallic sulfide mining that has been proposed within the watershed. Extensive monitoring will establish a comprehensive baseline data set that includes parameters necessary to determine sulfide mining related impacts and quantify resource injury.

During the grant cycle we will monitor a number of sites predetermined during the development of our QAPP for this project. The parameters we will monitor, and the sites which we monitor, have been determined by the QAPP for this project. The sites monitored in this grant period will be monitored to build a baseline water quality database for the Silver River Watershed that will specifically address the potential impacts from metallic sulfide mining.

The expected results are the collection of a detailed, baseline water quality dataset that will allow for a pre-development characterization of the Silver River Watershed.

c. Monitoring Design:

This scope of the monitoring program will include the Silver River Watershed as defined by its exterior boundaries. The number and location of the sites sampled will depend on available funding and follow the guidelines established in the QAPP for this project.

During FY2007 remote sensing units were purchased to help increase our monitoring ability for this now sensitive area. This equipment will be in use throughout the grant period.

The parameters used to determine the level of water quality within the sampling locations are listed

in **Attachment V**. These include the 9 mandatory parameters required by the region V guidance. In addition to these parameters we will be sampling for low level metals at the selected locations outlined in the agreement with KBIC. See **Attachment VI**.

d. Core and Supplemental Water Quality Indicators:

We will monitor the sites selected during the development of the QAPP for the parameters chosen within that document. Sites will continue to be monitored for the development of a database on Reservation water quality.

e. Quality Assurance:

Decision errors are described in the EPA approved QAPP for the Surface Water Monitoring Program.

f. Data Management:

Data acquired through sampling will be put into a few different databases and reports as follows.

1) STORET – All analytical and sampling data will be input into the database as soon as approval for disclosure of this data is given by the Tribal Council.
2) 305 (b) – This annual report will include all relevant information generated by this study.
3) GIS – A comprehensive GIS database will be created and maintained from data acquired through sampling.

g. Data Analysis/Assessment:

Data analysis for this project will be conducted by the Natural Resources staff for the Keweenaw Bay Indian Community. All data will be reviewed as it is received before entry into our databases.

h. Deliverables:

Progress reports will be submitted according to the grant's requirements and guidelines. The reporting requirement at present is written quarterly reports submitted to the EPA project coordinator and upon closure of grant, including a programmatic self-analysis and a summary of reservation waters. These reports shall include a summary of the tasks completed as they relate to this project and a summary of all the data collected to date.

i. Programmatic Evaluation:

The design and implementation of this part of the program will be reviewed as data comes in and quarterly by internal staff and the EPA.

j. General Support and Infrastructure Planning:

The total cost for this project in FY2011-FY2012 will be: $164,573.30. The specific costs associated

with this project are: Personnel Salary/Fringe: $62,207.50 (Water Quality Specialist $15.76/hr FTE 0.30; Water Resource Technician: $11.89/hr FTE 0.50; Fringe: $41,662.26), Other Supplies: $2980.00, Travel/Training/Vehicle Operation and Lease $1,825.00, Laboratory Analysis $29,328.37, Space Lease $4,275.00, Indirect Cost $22,295.17.

3. Participation in Committees interested in Water Protection:

We will continue our participation on committees with water protection goals. The objective of our participation in these committees are to assure that 1) the concerns of the committees reflect the interests of the Community, and 2) the programs established on the Reservation are consistent with the goals of these committees. Committees and organizations in which we will continue our participation include: Lake Superior Binational Program Workgroup's Habitat Committee and Aquatic Committee; Lake Superior Task Force; Michigan Tribal Environmental Group; Keweenaw Bay Indian Conservation District's Natural Resources Committee; and other pertinent groups as time and funds will allow.

a. Output:

We will send a representative from Keweenaw Bay Indian Community to participate in local and regional organizations that also have an interest in protecting water resources.

We will participate in regional organizations with water quality interests by being an active member of the Lake Superior Binational Program Work Group. Our participation will consist of our involvement with the Habitat and Aquatic Work Group Committees. KBIC is also represented by the water quality specialist on the Public Advisory Council for the Deer Lake Area of Concern.

b. Outcome:

Are the goals of Keweenaw Bay Indian Community's Water Quality Protection and Management Program compatible with those of local and regional organizations?

The Keweenaw Bay Indian Community is responsible for the management of more than 70,000 acres of land including approximately 17 miles of Lake Superior shoreline, 80 miles of streams and rivers, 15,000 acres of lakes and 3000 acres of wetlands. As a stakeholder in the region, it is necessary that we participate in local and regional organizations that share similar water protection goals. This participation is necessary to ensure our goals reflect, or are compatible with, the goals of these other organizations. In addition, it is necessary for us to ensure that these organizations reflect our goals as well. Our participation in the process of developing these goals will assure positive representation of the KBIC Natural Resources Department and water programs.

It is expected that KBIC and committees will share a set of more common goals toward the protection and maintenance of water resources in the area and region. This should help to insure a more efficient use of resources and a greater knowledge of those resources we are trying to protect.

c. Design:

Our participation will be limited to organizations with either: 1) an interest in local water pollution issues, 2) a regional water pollution interest in which we are a stakeholder, such as protecting Lake

Superior, 3) an interest in wetlands management and protection.

The environmental problems that require solutions are that Tribal interests may not protected, or taken into account by committees in the area without representation of KBIC. At the same time, shared goals of both the Tribe and various committees may not be attained without active participation and input from one another. Participation helps to insure that our goals remain compatible and that they are more likely to be met though cooperation and the use of shared resources and information.

d. Milestones:

Continued and documented participation in our committees and conferences during the grant period.

e. Timeline:

The Area of Concerns groups meet monthly in Ishpeming, Michigan to discuss progress on Dear Lake and other area of concerns in our area. We attend those based on the importance of the discussion as it relates to the Keweenaw Bay Indian Community. The annual AoC meeting is in quarter four of each year. The LaMP committee meets quarterly to discuss issues in the Lake Superior basin. Water Resources staff attend those as they can. The SWiMS meeting in Chicago is attended each year by the water staff in February or March. We also attend any trainings or conferences we deem relevant and important to our program throughout the year.

f. Deliverables:

Progress reports will be submitted according to EPA's requirements. These requirements at present are written quarterly reports submitted to the EPA project coordinator. Copies of all agendas for meetings attended will be submitted to the EPA along with this quarterly report.

g. Programmatic Evaluation:

If the interests of these committees continue to be relevant to the interests of Keweenaw Bay Indian Community, then we will continue to participate on said committees. If other organizations approach us and seek a representative from Keweenaw Bay Indian Community, then we will consider participating if: 1) their concerns and interests are found relevant to the Community; 2) there is available staff with time to participate in the organization's activities.

h. General Support and Infrastructure Planning:

The total cost of this project for FY2011-FY2012 will be: $10,074.60. The specific costs associated with this project will be: Personnel Salary/Fringe: $4,407.50 (Water Resources Specialist: $15.76/hr, FTE 0.05; Fringe= $2,799.95) Other Supplies: $375.00 Vehicle Lease/Travel/Training: $912.50 Indirect Cost (Salary * 35.84%) =$1,579.65

4. Public Outreach and Education:

We will continue our efforts to educate the public about water quality, wetlands protection, groundwater, and pollution prevention. This aspect will be incorporated into each project outlined for this grant cycle.

Public education and outreach will be accomplished by participating or hosting in activities such as 1) making educational presentations at public events, 2) preparing educational displays for public events, 3) preparing and distributing educational material, 3) educating the Community on wetlands protection.

a. Output:

The focus of the efforts and projects associated with this objective will be on the local community of the L'Anse Reservation.

We will take advantage of every opportunity for public education as part of our activities funded by this grant.

If we are invited to participate in a public outreach event, or see a way to incorporate a public educational aspect as part of the projects funded by this grant, then we will pursue these opportunities as funding and time allow.

b. Outcome:

How do we generate public interest and participation in the protection of our water resources? Increasing the public's awareness of their role in the protection of our water resources is an important aspect to incorporate into a comprehensive water quality protection and management program. With the public as an invested partner in the effort to protect our water resources, the success of the program is immeasurably enhanced. This is especially true with the creation and implementation of our Source Water Assessment and Protection Plans as well as for other projects such as the well abandonment inventory and watershed inventories, where public input is crucial to the success of the projects.

It is expected that the Community will become more informed about activities that can negatively impact Reservation water resources. From this awareness, it is expected that some amount of potential, negative impact will be averted and that the public will actively participate in the protection of water resources.

c. Design:

As part of our participation with inter-departmental committees, other organizations with water pollution interests, and as part of our work on projects funded by this grant, we will seek opportunities to incorporate public education into our activities. These types of activities include: 1) participating in public outreach activities planned by other tribal government departments or local community organizations. Examples of this participation include such activities such as hosting an information booth or sponsoring a community collection of household pollutants; 2) participating in or sponsoring public meetings that are planned as part of the process of developing an integrated resource management plan, developing water quality standards, wetlands protection, and other Community water resource issues. 3) Working with local schools to develop ongoing programs and

water-related projects designed to stimulate interest in water conservation and protection, as well as to foster a sense of investment and ownership our water resources, such as local involvement in data collection during World Water Monitoring Day and presentations to the local schools.

d. Timeline:

We have the Environmental Fair in April of each year and the Kid's Fishing Derby in June of each year. We also work with the area schools and local youth groups as opportunities arise throughout each fiscal year.

e. Milestones:

We work with other programs within our department to help with the Environmental Fair and Kids Fishing Derby to promote good stewardship while out of doors. Our focus is on water quality. We also take any opportunities to work with youth groups and school programs to help teach kids about the importance of good water quality.

f. Deliverables:

A summary of all activities related to efforts of public education will be presented as part of the quarterly reports generated to satisfy EPA requirements. Examples of any educational material generated by these efforts will be submitted along with all quarterly reports.

g. Programmatic Evaluation:

The problem requiring a solution is that a public unaware of the environmental concerns affecting its water resources is less able to make good decisions about those resources and also more likely to abuse or contaminate them. Public awareness and education helps to build a sense of investment and ownership in the resources, fostering a greater understanding and caring community that will seek to actively protect and enhance its resources and surrounding environment.

h. General Support and Infrastructure Planning:

This project for FY2011-FY2012 will cost: $10,074.60. The specific costs associated with this project will be: Personnel Salary/Fringe: $4,407.50. (Water Resources Specialist: $15.76/hr, FTE 0.05; Fringe= $2,799.95) Other Supplies: $375.00 Travel/Training/Vehicle Lease: $912.50 Indirect Costs (Salary * 35.84%) = $1,579.65

5. NPDES Compliance Duties:

Polluted storm water runoff from construction sites often flow into local rivers and streams. Sediment is usually the pollutant of concern, although phosphorus, nitrogen, pesticides, oil and grease, concrete truck washout, sanitary waste, and trash are other common pollutants. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those from agricultural lands, and 1,000 to 2,000 times than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting siltation and the contribution of other pollutants from construction

sites can cause physical, chemical, and biological harm to our nation's waters. Local efforts to control sediment and trash at construction sites have many benefits in addition to avoiding environmental degradation. These benefits include addressing citizen complaints about mud in the street and blowing trash and reduction of sediment and debris in storm sewers.

a. Output:

An inspection by a Tribal Inspector is the gathering of evidence and the physical observation of certain conditions and is not a determination of compliance with federal law. The results of inspections carried out by Tribal Inspectors may be used by U.S. EPA in follow-up compliance monitoring and enforcement actions; however, U.S. EPA is responsible for any subsequent enforcement action. Inspections will be carried out in accordance with all applicable federal requirements.

A federal credential cannot be used to carry out Tribal programs. KBIC retains such independent authority as it may have under Tribal law, but this is separate from authority under federal law.

b. Outcome:

KBIC has two credentialed inspectors that are authorized by U.S. EPA to address the matters set forth in the U.S. EPA Guidance. U.S. EPA may, in its sole discretion, issue federal credentials using the U.S. EPA Guidance. Both tribal inspectors have completed the appropriate training as described in Appendix 3 of the U.S. EPA Guidance.

The inspector's supervisor will either certify to U.S. EPA that the inspector has met each of the applicable training elements as specified in Appendix 3 of the U.S. EPA Guidance or certify that the inspector has taken other training that covers the same material.

Inspections will take place within the exterior boundaries of the Reservation. KBIC Storm Water Inspectors will follow the protocols identified in the attached Storm Water Inspection Standard Operating Procedure.

c. Design:

All Storm Water inspections, performed by KBIC, must be coordinated with and authorized by U.S. EPA Region 5 using the developed Monthly Inspection Log and workplan (**See Attachments VIII and IX**). The U.S. EPA SW Contact will e-mail the KBIC SW Compliance Officer notification of authorized inspections. Upon receipt of the e-mail authorization, the KBIC SW Compliance Officer and/or SW Technicians will conduct an inspection within 10 business days. However, if more than one inspection is authorized, additional time to conduct the inspection may be granted by U.S. EPA provided that all inspections are conducted within 20 business days from authorization.

KBIC will maintain a database of existing Citizen Complaints and provide periodic review and reports to U.S. EPA, as specified in the MOU. The tribe will conduct survey of construction sites and develop a database of potential inspections. The results of these surveys and potential inspection database will be used to jointly develop a Monthly Inspection Schedule with US U.S. EPA Region 5.

d. Timeline:

Every other Friday throughout the grant cycle the Michigan ENOI website is checked for new entries and their locations. A windshield survey is also conducted at this time. Inspections are to take place during the construction season which is from April through October of each year. An annual safety refresher training is required of each Inspector usually completed in the spring.

f. Milestones:

The tribe will complete inspections of all activities requiring an NPDES permit for the construction activites disturbing more than an acre. There is one multi-year project on the reservation that has been inspected in the previous grant period. We anticipate an additional inspection of this location during the grant period. The tribe anticipates two to three sites per year going forward for inspection. Compliance assistance will be given to each property manager after completion of inspection.

g. Quality Assurance:

Inspectors will review relevant Permits prior to conducting an inspection. Inspectors will present credentials upon entering facility and conduct entrance interviews of construction site managers describing the scope of subject inspection. The inspector will conduct a physical inspection of the subject site. While onsite, the inspector will conduct a records review (Storm Water Pollution Prevention Plan, Notice of Intents, etc.). The inspector will fill out required U.S. EPA Forms and take notes in appropriate bound notebooks. The inspector will document all alleged violations and include digital photos whenever possible. The inspector will conduct an exit interview at the completion of the inspection. At the exit interview the inspector will provide a brief description of the conditions found at the site. After the site inspection, the inspector will Generate and submit a Report, and other U.S. EPA required forms to U.S. EPA Region 5. The approved QAPP for this project (11/27/06) describes these activities in greater detail. Amendments to the QAPP will be made as needed.

h. Data Management:

Appropriate records must be maintained to provide adequate documentation of the entire project. KBIC must verify and document that minimum training requirements are met. Both KBIC and U.S. EPA will monitor the issuance of physical credentials and track the use of these credentials. Each credential will have a unique identifier/number and identify the date issued, date of expiration, date lost or stolen, date returned, date renewal, and date revoked.

KBIC will fill out monthly inspection logs for all inspections conducted and report them to the EPA as described in the workplan for this project (**See Attachments VIII and IX**).

i. Data Analysis/Assessment:

Inspections and the data generated must be of known and consistent quality. Specific procedures and protocols are required to ensure legal defensibility.

j. Deliverables:

KBIC reports will identify any additional training needed for tribal inspectors.
The U.S. EPA SW Contact, Tribal Liaison, and ORC Attorney will provide a programmatic assessment of this project on a semi-annual basis.

k. Programmatic Evaluation:

Conference calls between the KBIC SW Compliance Officer and the U.S. EPA SW Contact will be conducted on a monthly basis. Items discussed in these calls will include progress of work plan activities and problems or obstacles encountered.

The U.S. EPA SW Contact will provide feedback to KBIC on the quality of each inspection and inspection report.

The KBIC Storm Water Compliance Officer will ensure that monthly briefing to U.S. EPA SW Contact are performed and provide recommendation on potential enforcement actions.

The Branch QA Contact will perform an Inspection Quality Assessment based on inspection reports provided by KBIC and compare to requirements identified in approved QAPP.

l. General Support and Infrastructure Planning:

This project for FY2011-FY2012 will cost: $20,000.00. The specific costs associated with this project will be: Personnel Salary/Fringe: $10,000.00. (Water Resources Specialist: $15.76/hr, FTE 0.05) Other Supplies: $1500.00 Travel/Training/Vehicle Lease: $3,916.00 Indirect Costs (Salary * 35.84%) = $3,584.00

V. Other Specific Water Program Activities and Projects

Other related water programs for KBIC include: 1) Well abandonment project, which is funded through a BIA grant and 2) Wetland inventory of the L'Anse Reservation is being funded by the U.S. Fish and Wildlife Service, as well as 3) a sensitive plant inventory of our Reservation is being funded by an EPA GAP grant and GLNPO. 4) KBIC water program staff will also be involved in various activities related to metallic sulfide mining within the L'Anse Indian Reservation, which may include, but are not limited to; committee and workgroup participation, document review and oversight on other projects similar to the proposed Silver River Watershed monitoring project (objective 2.b of this workplan). 5) KBIC Water program Staff will also assist KBIC Public Water Supply operators with various compliance and reporting issues as they arise. 6) KBIC Water program Staff will also address various Reservation water quality issues as they are brought forth by KBIC members, such as wild rice, wetlands, abandoned wells, drinking water, point and non-points source discharges. These activities can all be related back to one or more of the KBIC workplan objectives, such as data, or resource sharing, overlapping issues such as Keweenaw Bay being a monitored surface water body as well as the source water for three public water supplies that service KBIC members.

VI. Other Funding Sources

This EPA workplan and proposal is supported by 5% match from the Tribal Council and supportive BIA water resources projects.

VII. Deliverables

1) The MBE/WBE reports will be sent quarterly along with procedural reports due to the EPA.

2) Quarterly reports will be competed and sent to the EPA within 30 days of the end of each quarter.

3) A Tribal Assessment Report, which includes the Water Quality Assessment Report, will be submitted at the end of grant period as per the new region V guidance.

4) The end of fiscal year report will be submitted for this grant cycle FY2011-FY2012 on or before April 30th, 2012 and April 30th, 2013.

VIII. Time Frame

The time frame for this proposal is FY2011-FY2012 or October 1, 2010 through March 31, 2013. The attached budget (Attachment II) details specific costs. A USEPA Object Class format budget is also included as Attachment III.

Attachments

Attachment I.

Attachment II.

Expenditures

Federal
Tribal Match
Total

50140 Coordinator

Water Quality Specialist ($16.00/hr, 40 hours/week, 52 weeks)
Director/Coordinator: October 1, 2009 - September 30, 2010.

$88,200.00
$4,950.00
$93,150.00

KBIC Water Resources Technician ($12.80/hr, 40 hours/week, 52 weeks)
KBIC Natural Resources Technician, October 1, 2009 - September 30, 2010

$71,575.00
$4,950.00
$76,525.00

Total

$159,775.00
$9,900.00
$169,675.00

51100 Fringe:

state and fed, unemploy tax, life ins, BC/BS, Wkmns comp
Water Quality Specialist: October 1, 2009 - September 30, 2010

$51,049.08
$4,950.00
$55,999.08

Water Resources Technician: October 1, 2009 - September 30, 2010

$44,775.08
$4,950.00
$49,725.08

Total

$95,824.16
$9,900.00
$105,724.16

52225 Other Supplies

Laboratory Supplies

$2,750.00
$0.00
$2,750.00

Office Supplies

$7,500.00
$0.00
$7,500.00

Field Supplies/Equipment

$4,100.00
$0.00
$4,100.00

Total

$14,350.00
$0.00
$14,350.00

53330 Vehicle Operation
Vehicle Lease

$3,500.00
$0.00
$3,500.00

53610 Vehicle Lease
Vehicle Operation

$10,500.00
$0.00
$10,500.00

53310 Travel/Training

Travel/Training

$8,166.00
$0.00
$8,166.00

Total

$22,166.00
$0.00
$22,166.00

53620 Space Lease
Office Space

$14,250.00
$0.00
$14,250.00

53650 Other Fees

$0.00
$0.00
$0.00

53210 Telephone
Telephone/Internet

$2,500.00
$0.00
$2,500.00

53110 Consultant
Outside Laboratory Costs

$128,071.49
$0.00
$128,071.49

Consultation Fee

$0.00
$0.00
$0.00

Total

		$130,571.49
		$0.00
		$130,571.49
55140 Capital Outlay-Equipment		
Equipment		
		$0.00
		$0.00
		$0.00
54110 Indirect Cost:	Salary x 35.84%	
Total		
		$57,263.35
		$0.00
		$57,263.35
Total Operating Expenditures		
		$495,200.00
		$19,800.00
		$515,000.00

KBIC LINE ITEM BREAKDOWN (10/1/10-3/31/13)

LINE	DESCRIPTION	FY2011 10/1/10 - 3/31/12	FY2012 4/1/12 - 3/31/13	10/1/10 - 3/31/13
50101	Water Quality Specialist (Micah)	52,420.00	35,780.00	88,200.00
50309	Water Tech (Kit)	42,445.00	29,130.00	71,575.00
51100	Micah	30,629.45	20,419.63	51,049.08
51100	Kit	26,865.05	17,910.03	44,775.08
52225	Other Supplies			7,500.00
	Office Supplies (such as paper, printer ink, references, office furniture.)	1,500.00	1,000.00	
	copies/reproductions	300.00	200.00	
	computer software/upgrades	2,500.00	2,000.00	
	Lab Supplies (Such as shipping supplies, reagents, glassware, replacements/repairs.)	750.00	500.00	2,750.00
	Field Supplies such as water quality sondes, instrument repair, environmental clothing, sampling trailor	3,100.00	1,000.00	4,100.00
53110	Consultant (Sole Source)			128,071.49
	Analytical Water Chemistry	76,082.89	51,988.60	
53210	Telephone			2,500.00
	Telephone (12 months @ $83.33 /mo)	1,500.00	1,000.00	
53310	Travel/Training			8,166.00
	In State:			
	MTEG Meeting x 4	1,500.00	1,000.00	
	Out of State:			
	Chicago EPA, SWiMS or TOTEMS, Stormwater Refresher	3,083.00	2,333.00	
53610	Vehicle Lease	2,000.00	1,500.00	3,500.00
53330	Vehicle Operation	6,000.00	4,500.00	10,500.00
53620	Equipment Lease	0.00	0.00	
53650	Space Lease	8,550.00	5,700.00	14,250.00
53850	Other Fees	0.00	0.00	
54110	Indirect Cost (salary * 35.84%)	32,207.61	21,471.74	57,263.35
55140	Capital Outlay-Equipment	0.00	0.00	
	Total	**284,600.00**	**190,600.00**	**495,200.00**
	Tribal Match	11,880.00	7920	**19,800.00**
	EPA Allocated Funds			**-515,000.00**

Attachment III.

EPA CWA 106 Grant (Account 305)
Budget 10/1/10-3/31/13
KBIC Accounting Format

		Budget
50101	Water Quality Specialist (Micah)	88,200.00
50140	Coordinator	0.00
50309	Water Tech (Kit)	71,575.00
51099	Fringe - SS Employer (Micah)	5,158.40
51099	Fringe - SS Employer (Kit)	4,127.65
51100	Fringe (Micah)	37,770.00
51100	Fringe (Kit)	33,840.00
51101	Fringe- Employer medicare (Micah)	1,206.40
51101	Fringe- Employer medicare (Kit)	965.34
51102	Fringe-State Unemployment (Micah)	630.00
51102	Fringe-State Unemployment (Kit)	630.00
51103	Fringe-401K (Micah)	0.00
51103	Fringe-401K (Kit)	0.00
51104	Fringe-Workmans Comp (Micah)	4,925.44
51104	Fringe-Workmans Comp (Kit)	3,941.24
51105	Fringe-Life and Disability (Micah)	1,358.83
51105	Fringe-Life and Disability (Kit)	1,270.85
51106	Fringe-FUTA Taxes (Micah)	0.00
51106	Fringe-FUTA Taxes (Kit)	0.00
52225	Other Supplies	14,350.00
53110	Consultant/Lab Analysis	128,071.49
53210	Telephone	2,500.00
53310	Travel/Training	8,166.00
53330	Vehicle operation	10,500.00
53610	Vehicle Lease	3,500.00
53620	Equipment Lease	0.00
53650	Space Lease	14,250.00
53850	Other Fees	0.00
54110	Indirect Cost	57,263.36
55140	Capital Outlay-Equipment	0.00
	Total	**495,200.00**
	Revenues	
41195	Federal - EPA	495,200.00
48100	Matching - BIA 206	19,800.00
41115	Carryover Funds	0.00
	Total Revenues	**515,000.00**

Attachment IV.

Site ID	Name	FY2011	FY2012	FY2013
SR1HD	Silver River 1 Headwaters	X	X	X
SR2NP	Silver River 2 Monitoring Station	X	X	X
SR3NP	Silver River 3 Monitoring Station	X	X	X
SR4MO	Silver River 4 Mouth	X	X	X

DC1MS	Dakota Creek 1 Monitoring Station		X	X
GC1MS	Gomanche Creek 1 Monitoring Station	X		
LSC2MO	Little Silver Creek Mouth		X	X
LSC1HD	Little Silver Creek Headwaters		X	X
LC1MS	Linden Creek 1 Monitoring Station	X	X	X
DAC1MS	Daults Creek 1 Monitoring Station	X		
DEC1MS	Denomee Creek 1 Monitoring Station	X		
FR1HD	Falls River 1 Headwater	X	X	X
FR2MO	Falls River 2 Mouth	X	X	X
BC1MS	Boyers Creek 1 Monitoring Station	X		
RC1MS	Roubillard Creek 1 Monitoring Station		X	X
MC1MS	Menge Creek 1 Monitoring Station		X	X
BLC1MS	Black Creek 1 Monitoring Station		X	X
HC1MS	Hazel Creek 1 Monitoring Station		X	X
TC1MS	Tangen Creek 1 Monitoring Station	X		
MDC1MS	Mud Creek 1 Monitoring Station	X		
CC1HD	Carp Creek Headwater	X	X	X
CC2NP	Carp Creek Non-point		X	X
CC3MO	Carp Creek Mouth	X	X	X
KC1MS	Kelsy Creek 1 Monitoring Station	X		
SC1MS	Secret Creek 1 Monitoring Station	X		
PC1MS	Paiges Creek 1 Monitoring Station	X		
RI1MS	Roubillard Impoundment	X		
TA1MS	Taylor Creek 1 Monitoring Station		X	X
BR1MS	Burns Creek 1 Monitoring station		X	X
OG1MS	Ogemaw Creek 1 Monitoring Station	X		
TL1MS	Third Lake 1 Monitoring Station	X	X	X
LL1MS	Laws Lake 1 Monitoring Station	X	X	X
BL1MS	Bishop Lake 1 Monitoring Station	X	X	X
SP1MS	Sand Point 1 Monitoring Station	X	X	X
LS1HD	Lake Superior 1 Headwater	X	X	X
LS2NP	Lake Superior 2 non-point	X	X	X
LS3PS	Lake Superior 3 non-point	X	X	X
WSR1MS	West Sleeping River 1 Monitoring Station	X	X	X
WSR2MO	West Sleeping River 2 Mouth	X	X	X
ESR1MS	East Sleeping River 1 Monitoring Station	X	X	X

Attachment V.

Suface Water Parameters

Parameters	
Date	
Alkalinity	(mg/L)
Cadmium	(ug/L)
Calcium	(mg/L)
Chloride	(mg/L)
Chromium	(ug/L)
Coliform, Fecal	(col/100ml)
Conductivity	(umho@25C)

Copper	**(ug/L)**
Hardness	**(mg/L)**
Iron	**(mg/L)**
Lead	**(ug/L)**
Magnesium	**(mg/L)**
Manganese	**(ug/L)**
Mercury	**(ug/L)**
Nitrate	**(mg/L)**
Nitrogen, Kjeldahl	**(mg/L)**
Phosphorus tot.	**(mg/L)**
Phosphorus tot. reac.	**(mg/L)**
Potassium	**(mg/L)**
Solids, total	**(mg/L)**
Solids, tot. susp.	**(mg/L)**
Sulfate	**(mg/L)**
Zinc	**(ug/L)**
Sulfide	**(mg/L)**
Ammonia	**(mg/L)**
pH	
Temperature	**(C)**
Dissolved Oxygen	**(mg/L)**

*These parameters are used at each site covered under the Surface Water Monitoring Program.

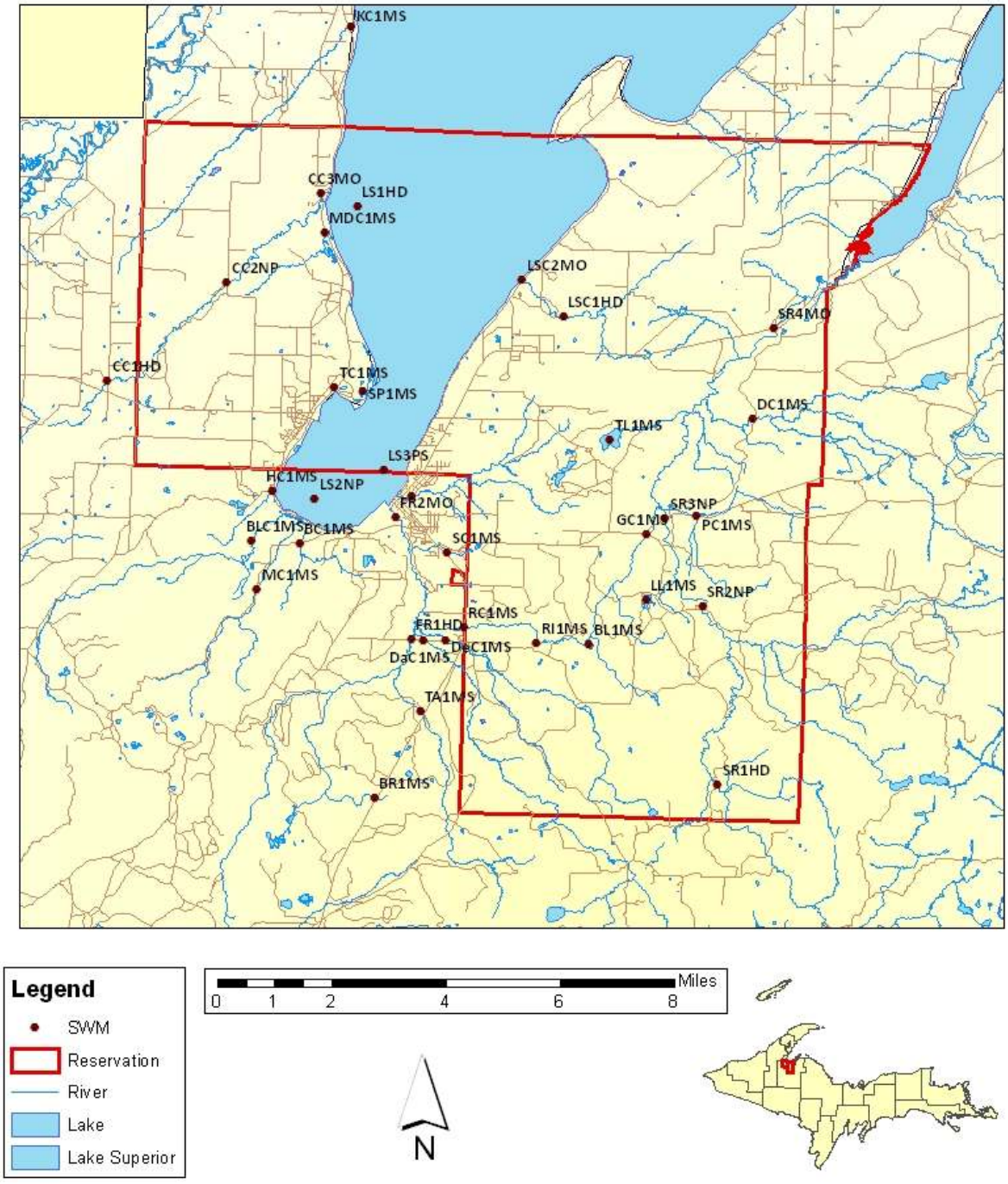
Drinking Water Parameters

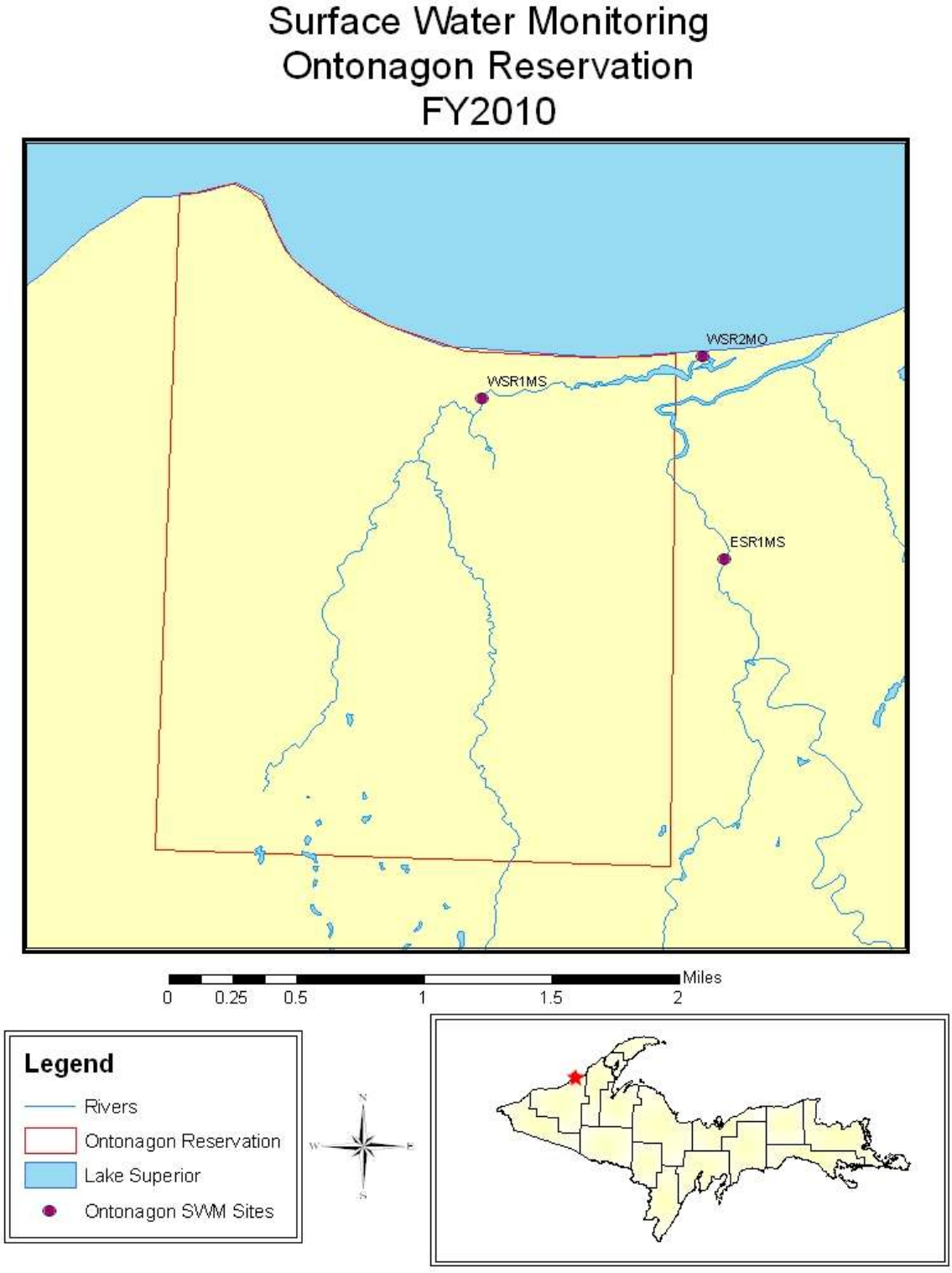
Parameters	
Date	
Alkalinity	**(mg/L)**
Cadmium	**(ug/L)**
Calcium	**(mg/L)**
Chloride	**(mg/L)**
Chromium	**(ug/L)**
Coliform, Fecal	**(col/100ml)**
Conductivity	**(umbo@25c)**
Copper	**(ug/L)**
Hardness	**(mg/L)**
Iron	**(mg/L)**
Lead	**(ug/L)**
Magnesium	**(mg/L)**

Manganese	**(ug/L)**
Mercury	**(ug/L)**
Nitrate	**(mg/L)**
Phosphorus, total	**(mg/L)**
Potassuim	**(mg/L)**
Sodium	**(mg/L)**
Sulfate	**(mg/L)**
Zinc	**(ug/L)**
Sulfide	**(mg/L)**
Ammonia	**(mg/L)**
pH	
Temperature	**(C)**

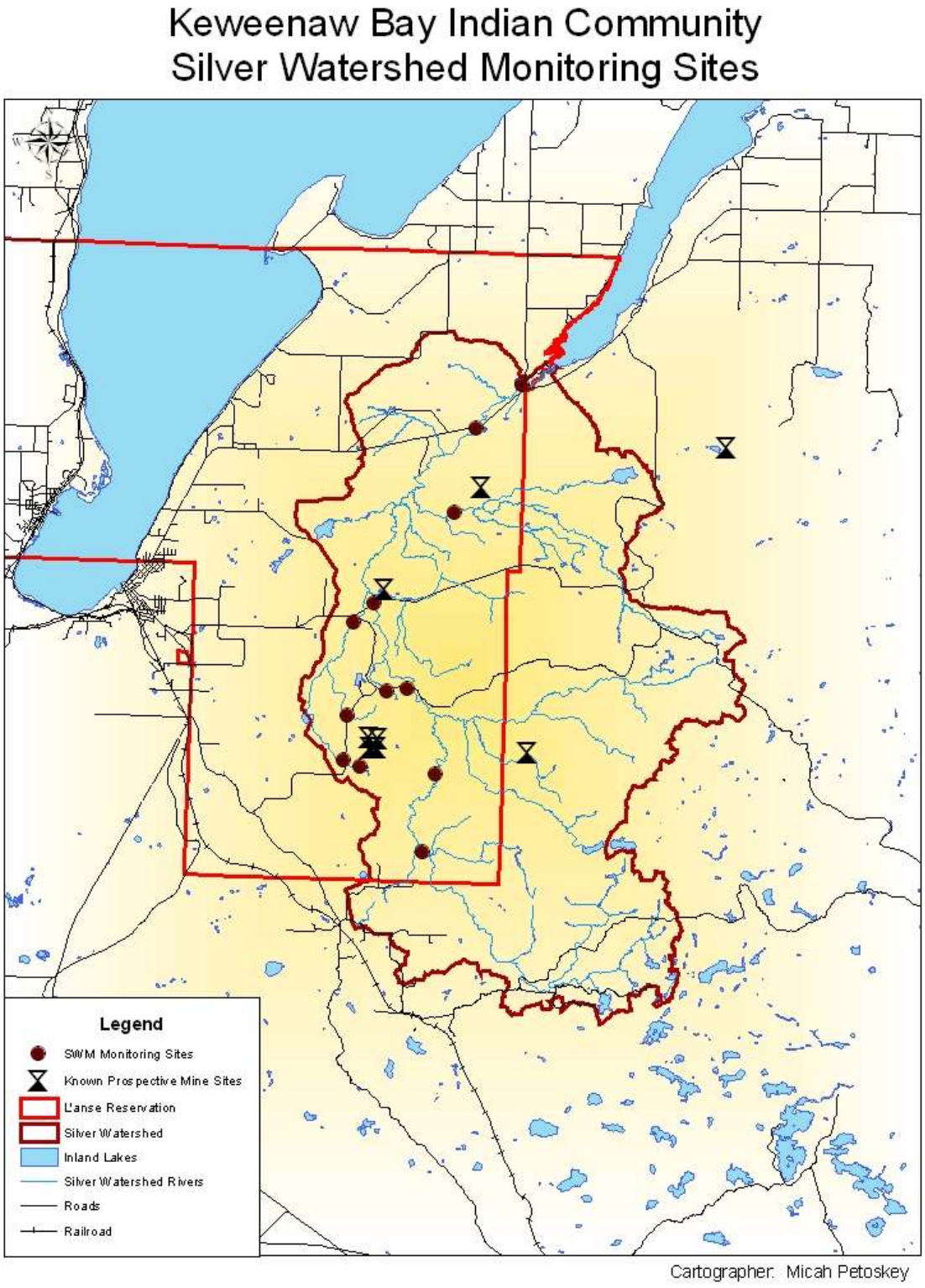
Attachment VI.

Surface Water Monitoring
FY2011 - 2012





Attachment VII.



Attachment VIII.

Monthly Inspection Log

Inspector Name_____
Tribe_____
Month _____

Date	Name of Company	Location	NPDES Permit	List on NOI Website (if yes list date)	Size (Acres)	Phase of Construction	Tribal Facility Y/N	Other

For the Period of _____through _____ the U.S. EPA authorizes credentialed tribal representatives of Keweenaw Bay Indian Community to conduct inspections at the following facilities:

Name of Company	Location	NPDES Permit
Baraga County Memorial Hospital		

SW Contact _____

WECAB Chief/Branch Chief_____

Indian Environmental Office Program Contact_____

Attachment IX.

September 2006

REVISION 1.0

Water Division
Enforcement Compliance Assurance Branch
US U.S. EPA Region 5
Chicago, Illinois

APPROVED:

_____ Date:_____
U.S. EPA Project Officer

_____ Date:_____
U.S. EPA Water Enforcement Compliance
Assurance Branch Chief for Water
Division Director

_____ Date:_____
KBIC Natural Resources Director

_____ Date:_____
U.S. EPA Project Officer

_____ Date:_____
Regional Storm Water Manager

_____ Date:_____
U.S. EPA SW Contact

_____ Date:_____
KBIC Compliance Officer

_____ Date:_____
Branch Quality Assurance Contact

TABLE OF CONTENTS

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U.S. EPA WECA Branch Chief for Division Director Sally Swanson	(312) 353-8512/swanson.sally@epa.gov
U.S. EPA Surface Water Contact Jenny Davison	(312) 886-0184/davison.jenny@epa.gov
	(906)524-5757 twarner@kbic-nsn.gov

KBIC Natural Resources Director
Todd Warner

_____ (906)524-5757 mpetoskey@kbic-nsn.gov
KBIC Surface Water Inspector
Micah Petoskey

_____ (906)524-5757 twarner@kbic-nsn.gov
KBIC Surface Water Compliance Officer
Todd Warner

1.0 PROJECT/TASK MANAGEMENT

The purpose of this document is to present a Quality Assurance Project Plan (QAPP) for Storm Water Inspections, Surveys and Investigations on Keweenaw Bay Indian Community (KBIC) lands. This QAPP provides general descriptions of the work to be performed, the standards to be met, and the procedures that will be used to ensure that the resultant compliance assurance activities or enforcement actions are scientifically valid, defensible and that uncertainty has been reduced to a minimum. Activities that require sampling will require the submittal and approval of a separate QAPP.

1.1. PROJECT DEFINITION/ BACKGROUND

Polluted storm water runoff from construction sites often flow into local rivers and streams. Sediment is usually the pollutant of concern, although phosphorus, nitrogen, pesticides, oil and grease, concrete truck washout, sanitary waste, and trash are other common pollutants. Sediment runoff rates from construction sites are typically 10 to 20 times greater than those from agricultural lands, and 1,000 to 2,000 times than those of forest lands. During a short period of time, construction sites can contribute more sediment to streams than can be deposited naturally during several decades. The resulting siltation, and the contribution of other pollutants from construction sites can cause physical, chemical, and biological harm to our nation's waters. Local efforts to control sediment and trash at construction sites has many benefits in addition to avoiding environmental degradation. These benefits include addressing citizen complaints about mud in the street and blowing trash and reduction of sediment and debris in storm sewers.

These sites are subject to NPDES storm water permitting requirements and can be found throughout Indian Country in Region 5. The U.S. EPA Region 5 Water Division is responsible for ensuring that the regulated (universe of construction) sites are in compliance with the Clean Water Act. However, the distance from the U.S. EPA office in Chicago to locations in Indian country (as is defined in 18 U.S.C. Section 1151) and the need to respond quickly to Wet Weather events are barriers to ensuring full compliance.

Federal environmental laws provide authority for the Administrator or his or her authorized representatives to enter upon and inspect facilities which are subject to the law. Inspectors monitor the compliance status of entities regulated by federal environmental law and create a credible deterrent to pollution and greater compliance with the law. U.S. EPA's authorization is demonstrated by a written agreement with a state or tribe and the issuance of a federal credential (hereinafter "federal credential(s)"). U.S. EPA recognizes that authorization of Tribal Inspectors and issuance of federal credentials in appropriate circumstances may enhance U.S. EPA's compliance efforts.

1.2. PROJECT/TASK ORGANIZATION

The organizational aspects of this project provide the framework for conducting specific tasks, and facilitate project performance and adherence to QC procedures and QA requirements. This project conforms to the QA policies and procedures defined in the U.S. EPA, R5, Water Division, Water Enforcement Compliance Assurance Branch Quality Management Plan. Key project roles are filled by those persons responsible for ensuring the collection of valid data and

the routine assessment of the data for precision and accuracy and the data users and the person(s) responsible for approving and accepting final products and deliverables.

1.3 KEY PERSONNEL

U.S. EPA Project Officer — is responsible for ensuring that grant requirements are met and that all project deliverables are received. The Project Officer will keep the official approved QAPP in the project file.

U.S. EPA Storm Water Manager — reviews and provides comments on this QAPP as well as provides oversight on implementation.

U.S. EPA Storm Water (SW) Contact – U.S. EPA will assign a staff person to serve as the U.S. EPA SW Contact for this project. The U.S. EPA SW Contact will be the primary contact between the KBIC SW Compliance Officer and the U.S. EPA program office. The U.S. EPA SW Contact is responsible for distribution of this QAPP and is responsible for reviewing project work, authorizing inspection activities, and conveying internally any necessary follow-up enforcement activities

KBIC SW Compliance Officer – KBIC will assign a staff person to serve as the SW Compliance Officer and complete the compliance assistance, inspection, and reporting/ communication activities outlined in this work plan. The SW Compliance Officer is an employee of KBIC. The SW Compliance Officer will not be treated or presented to third parties as a federal government employee or federal contractor. Duties of the SW Compliance Officer will be undertaken pursuant to a Memorandum of Understanding (MOU) developed by the Tribe and US U.S. EPA. The tribal compliance officer will keep a signed copy of the QAPP in its project file.

KBIC SW Technicians — KBIC will assign staff to serve as SW Technicians to conduct compliance assistance and inspection activities outlined in the work plan. The SW Technicians are employees of KBIC. The SW Technicians will not be treated or presented to third parties as federal government employees or federal contractors. Duties of the SW Technicians will be undertaken pursuant to a MOU developed between the Tribe and U.S. EPA.

Branch QA Contact — serves as the QA Manager for these activities. The QA Contact will review and recommend approval/disapproval to the Branch Chief and assist Storm Water Contact in monitoring compliance and evaluating results from project activities.

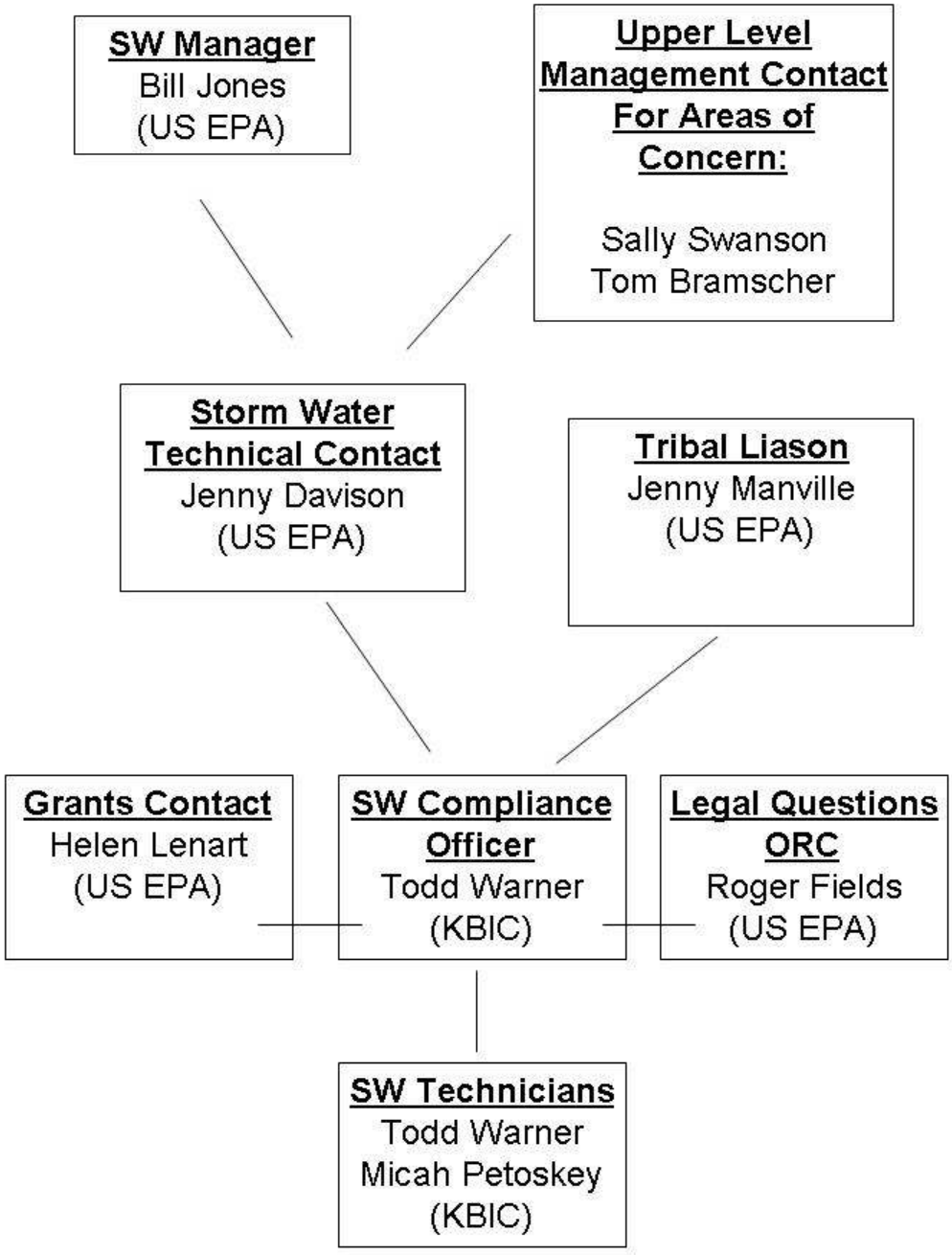
Branch Chief — approves and provides official sign-off on the QAPP.

1.4 PROJECT TASKS DESCRIPTION

Each of the tasks listed below have inherent QC requirements and requires oversight by trained staff. These activities can also be divided into a number of sub-tasks, each requiring management and QC oversight by qualified personnel. Several general tasks have been identified as critical to the completion of this project.

Major Tasks Include:	Responsible Party:
Initiate Training Program (Diagram A)	KBIC
Issue Credentials	U.S. EPA
Inspection Planning	KBIC / U.S. U.S. EPA
Perform Inspections	KBIC
Report Generation	KBIC
Oversight	U.S. EPA
Corrective Actions	KBIC / U.S. EPA

Surface Water Manager:	Bill Jones (U.S. U.S. EPA)
Upper Level Management Contact for Areas of Concern:	Sally Swanson, Branch Chief
	Tom Bramscher, Chief, Section 1
	Pat Kuefler, Chief, Section 2
Storm Water Technical Contact:	Jenny Davison(U.S. EPA) Tribal Liaison
Tribal Liaison:	Jenny Manville (U.S. EPA)
Legal Questions ORC:	Rodger Fields (U.S. EPA)
Grants Contact:	Helen Lenart(U.S. EPA)
Surface Water Compliance Officer:	Todd Warner (KBIC)
	Micah Petoskey (KBIC)
Surface Water Technicians:	Todd Warner (KBIC)
	Micah Petoskey (KBIC)


SW Manager
Bill Jones
(US EPA)
Upper Level Management Contact For Areas of Concern:
Sally Swanson
Tom Bramscher
Storm Water Technical Contact
Jenny Davison
(US EPA)
Tribal Liason
Jenny Manville
(US EPA)
Grants Contact
Helen Lenart
(US EPA)
SW Compliance Officer
Todd Warner
(KBIC)
Legal Questions ORC
Roger Fields
(US EPA)
SW Technicians
Todd Warner
Micah Petoskey
(KBIC)

NOTE:

Guidance for authorizing inspectors and issuing federal credentials, entitled "Guidance for Issuing Federal U.S. EPA Inspector Credentials to Authorize Employees of State/Tribal Governments to Conduct Inspections on Behalf of U.S. EPA" has been issued by U.S. EPA's Office of Enforcement and Compliance Assurance on September 30, 2004 (hereinafter "U.S. EPA Guidance"). All activities related to the authorization of inspectors and issuance and use of federal credentials will be consistent with the U.S. EPA Guidance, as well as all other U.S. EPA policies and directives.

1.5. QUALITY OBJECTIVES AND CRITERIA FOR INSPECTIONS

In order to ensure that inspections are carried out appropriately the protocols and activities set forth herein must be adhered to and monitored.

PRECISION

Precision is a measure of how reproducible the data collected is between inspections. It determines the consistency of repeated inspections that are performed. Inspections should be performed using standardized procedures to ensure fairness to the regulated community.

ACCURACY

Accuracy is a measure of the confidence that describes how well an inspection reflects the "true" state of a facility or construction site. The accuracy of an inspection system is impacted by errors introduced through the review of documents, site observations and evidence gathering.

REPRESENTATIVENESS

Representativeness is a qualitative expression of the degree to which inspection data accurately and precisely reflects the conditions at a facility or construction site. Representativeness is maximized by ensuring that for a given inspection appropriate up front planning and review of appropriate facility/site documents are performed.

COMPLETENESS

Completeness is the comparison between the amount of usable data generated from a site inspection to verify compliance/ non compliance with the permit or pertinent regulation.

COMPARABILITY

Comparability is a qualitative parameter that expresses the confidence that one inspection may be compared to another. Comparability of inspections is achieved through the use of standardized procedures, documentation of evidence and incorporation of checklists.

1.6 SPECIAL TRAINING REQUIREMENTS/CERTIFICATION

The following courses are mandatory for all prospective Tribal inspectors:

- Basic Inspector Course
- Health and Safety
- Terms and Condition of Authorization
- Clean Water Act specific training as set forth in Appendix 3, 5-G of the U.S. EPA Guidance (See additional requirements in work plan)

1.7 DOCUMENTATION AND RECORDS

Appropriate records must be maintained to provide adequate documentation of the entire project. KBIC must verify and document that minimum training requirements are met. Both KBIC and U.S. EPA will monitor the issuance of physical credentials and track the use of these credentials. Each credential will have a unique identifier/number and identify the date issued, date of expiration, date lost or stolen, date returned, date renewal, and date revoked.

KBIC will keep a record of each inspection conducted as well as a copy of any evidence colleted and documentation of all findings.

2.0 DATA GENERATION AND ACQUISITION

Inspections and the data generated must be of known and consistent quality. Specific procedures and protocols are required to ensure legal defensibility.

2.1 INSPECTION DESIGN

All Storm Water inspections, performed by KBIC, must be coordinated with and authorized by U.S. EPA Region 5. The U.S. EPA SW Contact will e-mail the KBIC SW Compliance Officer notification of authorized inspections. Upon receipt of the e-mail authorization, the KBIC SW Compliance Officer and/or SW Technicians will conduct an inspection within 10 business days. However, if more than one inspection is authorized, additional time to conduct the inspection may be granted by U.S. EPA provided that all inspections are conducted within 20 business days from authorization.

KBIC will maintain a database of existing Citizen Complaints and provide periodic review and reports to U.S. EPA, as specified in the MOU. The tribe will conduct survey of construction sites and develop a database of potential inspections. The results of these surveys and potential inspection database will be used to jointly develop a Monthly Inspection Schedule with US U.S. EPA Region 5.

2.2 INSPECTION METHODS

All authorized inspections will be conducted following the procedures outlined in the approved SOP attached hereto and the U.S. EPA NPDES Compliance Inspection Manual.

The Tribal Inspectors, with federal credentials, will only use those credentials in the manner described in this QAPP, the MOU and the U.S. EPA Guidance to assist U.S. EPA in carrying out

its compliance monitoring responsibilities under federal environmental statues. Inspectors will conform to all requirements of federal law, regulations and U.S. EPA policy and guidance.

2.3 INSPECTION ACTIVITIES

An inspection by a Tribal Inspector is the gathering of evidence and the physical observation of certain conditions and is not a determination of compliance with federal law. The results of inspections carried out by Tribal Inspectors may be used by U.S. EPA in follow-up compliance monitoring and enforcement actions; however, U.S. EPA is responsible for any subsequent enforcement action. Inspections will be carried out in accordance with all applicable federal requirements.

A federal credential cannot be used to carry out Tribal programs. KBIC retains such independent authority as it may have under Tribal law, but this is separate from authority under federal law.

2.4 INSPECTION CONSTRAINTS

KBIC will identify individual inspectors that they believe should be authorized by U.S. EPA to receive federal credentials in writing addressing the matters set forth in the U.S. EPA Guidance. U.S. EPA may, in its sole discretion, issue federal credentials using the U.S. EPA Guidance. Before being eligible to receive an U.S. EPA credential, a Tribal Inspector must complete appropriate training as described in Appendix 3 of the U.S. EPA Guidance.

The inspector's supervisor will either certify to U.S. EPA that the inspector has met each of the applicable training elements as specified in Appendix 3 of the U.S. EPA Guidance or certify that the inspector has taken other training that covers the same material.

Inspections will take place within the exterior boundaries of the Reservation. KBIC Storm Water Inspectors will follow the protocols identified in the attached Storm Water Inspection Standard Operating Procedure.

2.5 INSPECTION QUALITY CONTROL

Inspectors will review relevant Permits prior to conducting an inspection. Inspectors will present credentials upon entering facility and conduct entrance interviews of construction site managers describing the scope of subject inspection. The inspector will conduct a physical inspection of the subject site. While onsite, the inspector will conduct a records review (Storm Water Pollution Prevention Plan, Notice of Intents, etc.). The inspector will fill out required U.S. EPA Forms and take notes in appropriate bound notebooks. The inspector will document all alleged violations and include digital photos whenever possible. The inspector will conduct an exit interview at the completion of the inspection. At the exit interview the inspector will provide a brief description of the conditions found at the site. After the site inspection, the inspector will Generate and submit a Report, and other U.S. EPA required forms to U.S. EPA Region 5.

2.6. INSPECTION EQUIPMENT TESTING AND MAINTENANCE

KBIC inspectors will use Bound Notebooks for all inspection related notes. Digital photos will be taken using cameras that have accurate date stamps and file names will be recorded in the bound notebooks. For inspections sites that are not near specific landmarks inspectors may need to use Global Positioning System (GPS) units.

2.7 INSPECTION/ ACCEPTANCE FOR SUPPLIES AND CONSUMABLES

The KBIC Storm Water Program will maintain an inventory of all supplies and consumables that are required for inspections. This inventory will be conducted periodically and the results properly documented.

2.8 DATA ACQUISITION REQUIREMENTS

After the inspection has been completed, the inspector will prepare and submit a 3560 form, an Inspection Conclusion Data Sheet (ICDS), and any other required U.S. EPA Forms, to SW U.S. EPA Contact within one week of the inspection. The inspector will also prepare a report, to include observations, evidence and photographs of the inspection target. This report will be sent electronically to the U.S. EPA SW Contact within twenty (20) business days of the inspection date, followed by a hard copy sent via the U.S. Postal Service. If circumstances require more time to submit inspection forms or complete an accurate report, the inspector should talk with the U.S. EPA SW Contact who may grant additional time to complete the inspection forms or report.

In addition to inspection reports resulting from individual inspections, a progress report will be prepared by the Tribal SW Compliance Inspector and sent to the U.S. EPA SW Contact. These quarterly reports will include a listing of inspections conducted (site/project name, address, date of inspection, and findings), a list of potentially regulated sites/projects identified during windshield surveys, a list of potentially regulated sites/projects without a NOI in the U.S. EPA database, an update on the total hours charged to the project, and any need for project amendments. These reports will be sent electronically, followed by a hard copy sent via the U.S. Postal Service. The due dates of these reports will be determined by the U.S. EPA SW Contact, in consultation with the KBIC SW Compliance Officer.

At the end of the project, the KBIC SW Compliance Officer will prepare a final project report to be sent to the U.S. EPA SW Contact. This final report will summarize all work conducted under each work plan activity. This report will be sent electronically, followed by a hard copy sent via the U.S. Postal Service. The due date of this report will be within 90 days of the end date of the project.

The KBIC SW Inspector/Technician are responsible for writing the inspection reports and the KBIC SW Compliance Officer must review/concur with subject reports. The Compliance Officer is also responsible for providing program reports to U.S. EPA Region 5.

2.9 DATA MANAGEMENT

All inspections and inspection-related information will be kept on file by the KBIC SW Compliance Officer. This file will be kept for a period of at least five (5) years, and will be available on request by U.S. EPA representatives.

Data management procedures are vital for potential enforcement actions. The data generated for this project will be archived in both hard copy and electronic formats

3.0 ASSESSMENT/OVERSIGHT

The U.S. EPA SW Contact will be responsible for reviewing inspection reports generated by the tribe. The U.S. EPA may decide to accompany tribal inspectors on inspections and or perform audits of their activities.

The Branch QA Contact will perform an annual review of the quality assurance quality control practices for this project and provide a report to the WECA Branch management.

3.1 ASSESSMENT AND RESPONSE ACTIONS

Conference calls between the KBIC SW Compliance Officer and the U.S. EPA SW Contact will be conducted on a monthly basis. Items discussed in these calls will include progress of work plan activities and problems or obstacles encountered.

The U.S. EPA SW Contact will provide feedback to KBIC on the quality of each inspection and inspection report.

The KBIC Storm Water Compliance Officer will ensure that monthly briefing to U.S. EPA SW Contact are performed and provide recommendation on potential enforcement actions.

The Branch QA Contact will perform an Inspection Quality Assessment based on inspection reports provided by KBIC and compare to requirements identified in approved QAPP.

3.2 REPORTS TO MANAGEMENT

KBIC reports will identify any additional training needed for tribal inspectors.
The U.S. EPA SW Contact, Tribal Liaison, and ORC Attorney will provide a programmatic assessment of this project on a semi-annual basis.

The Branch QA Contact will provide an annual assessment of the QA activities for the project.

4.0 DATA VALIDATION AND USABILITY

The inspection and data management activities described in this QAPP will be reviewed to assess whether these activities were performed in a manner that is appropriate for accomplishing the project objectives. This assessment will include verification of the data, followed by data validation. Verification if the data is performed to determine whether the data have been generated according to the procedures defined in the QAPP. Data validation involves identifying the technical usability of the data for decisions relating to the project objectives.

4.1 DATA REVIEW, VALIDATION AND VERIFICATION

KBIC inspectors are expected to review all relevant permit and prevention plan requirements. All alleged violations must be accompanied by specific citations of infraction. The KBIC SW Compliance Officer ensures that each alleged violation is valid by reviewing the draft reports, notebooks and photos. Final reports must include concurrences from the KBIC Compliance Officers.

4.2 VALIDATION AND VERIFICATION METHODS

In order to verify that individual inspections are carried out appropriately a minimum inspection data package is required. This data package is described in detail in the Inspection SOP. A minimum of two levels of review are required prior to action being taken on any inspection report.

4.3 RECONCILIATION AND DATA USER REQUIREMENTS

Periodic conference calls between the tribal inspectors, compliance officers and the Storm Water Contact will facilitate discussion of the adequacy of inspection report packages as well as scheduling upcoming inspections.